

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

PATRICIA JACKSON,

Plaintiff,

v.

JACK MORTON WORLDWIDE, INC., *et al.*,

Defendants.

Case No. 3:21-cv-00389-HEH

**DEFENDANT ENCORE GLOBAL LP'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION OR FAILURE TO STATE A CLAIM**

NOW COMES Defendant, Encore Global LP (incorrectly named in the Amended Complaint as Encore Global, f/k/a PSAV, hereinafter "Encore Global"), by special appearance, and hereby moves this Court for entry of an Order granting its Motion to Dismiss for Lack of Personal Jurisdiction or Failure to State a Claim for the reasons set forth in the accompanying Memorandum in Support.

Dated: December 14, 2021

Respectfully submitted,

By: /s/ Patrick D. Blake

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of December 2021, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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